

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION )  
SERVICE CHANGES, 2012 ) Docket No. N2012-1  
)

**UNITED STATES POSTAL SERVICE INTERROGATORIES TO AMERICAN POSTAL  
WORKERS UNION, AFL-CIO, WITNESS SCHILLER, APWU-RT-2  
USPS/APWU-RT2—6-12**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following interrogatories and requests for production to APWU witness Schiller: USPS/APWU-RT2-6-12. Please refer to and apply the Instructions and Definitions attached to these interrogatories (which can also be relied upon in lieu of those provided in connection with promulgation of USPS/APWU-RT2-1-5).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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## **INSTRUCTIONS AND DEFINITIONS**

### **A. Instructions**

1. These interrogatories impose a continuing obligation to respond and to provide additional information as it becomes available.
2. If no information or documents are responsive to any of these interrogatories, please indicate the lack of responsive information or documents.
3. For each interrogatory, please identify the preparer or the person who supervised the response.
4. Please specify the interrogatory to which each document applies. If a document or narrative response applies to more than one interrogatory, please provide a cross reference.
5. For an interrogatory calling for the production of documents, please provide legible, true and complete copies of the documents. If a responsive document has been lost or destroyed, or is otherwise unavailable, please follow Instruction 11 below.
6. Where an interrogatory solicits a narrative response rather than the production of documents alone, a narrative response is required and the production of documents does not substitute for a narrative response.
7. These interrogatories are to be construed broadly to elicit all requested information which is discoverable under the Commission's Rules of Practice. Accordingly,
  - (a) The present tense includes the past tense and the past tense includes the present tense; and

(b) The singular includes the plural and the plural includes the singular.

8. If any responsive information is not available in the form requested, please provide the available information or documents which best respond to the interrogatory.

9. These interrogatories apply to all responsive information and documents in your possession, custody and control, or in the possession, custody or control of your attorneys, witnesses or other agents, from all files, wherever located, including active and inactive files and including electronic files.

10. If any responsive information or document is not in your possession, custody or control, but you know or believe that it exists, please identify the information or document and indicate to the best of your ability the location and custodian of the information or document.

11. If any document responsive to any of these interrogatories has been destroyed or is otherwise unavailable, please identify and describe:

- (a) The subject matter and content of the document;
- (b) All persons involved in the destruction or removal of the document;
- (c) The date of the document's destruction or removal; and
- (d) The reasons for the destruction or other unavailability of the document.

12. If you assert any claim of privilege or discovery immunity in response to any interrogatory, please identify each document withheld and state:

- (a) The document's title and type;
- (b) The privilege or immunity claimed and the basis for claiming such

privilege or immunity;

- (c) Each person who prepared, signed or transmitted the document;
- (d) Each person to whom the document, or any copy of the document was addressed or transmitted;
- (e) The date of the document; and
- (f) The subject matter of the document.

13. For each response which is generated by a computer or electronic data storage mechanism, please state:

- (a) The name of the file from which the response came;
- (b) How the data are stored (disks, tapes, etc.);
- (c) How the data are transmitted and received; and
- (d) The name of each person who collected the data or entered the data into the computer or electronic data storage mechanism.

14. For any interrogatory with subparts, please provide a complete separate response to each subpart as if the subpart was propounded separately.

15. If information or documents responsive to any of these interrogatories has previously been provided in this proceeding in response to an interrogatory by any participant, please provide a specific cross-reference. There is no need to make a duplicate response.

16. If you perceive any ambiguity in interpreting any interrogatory or any instruction or definition applicable to an interrogatory, please secure a clarification from counsel for the United States Postal Service as soon as the ambiguity is perceived.

## **B. Definitions**

1. “Communication” means any correspondence, contact, discussion or exchange between any two or more persons. The term includes, but is not limited to, all documents, telephone conversations or face-to-face conversations, electronic mail, conferences or other meetings.

2. “Document” means any written, recorded, computer-stored, computer-generated or graphic material however stored, produced or reproduced. The term is to be construed to the full extent of the definition in Rule 34 of the Federal Rules of Civil Procedure. Any document that is not exactly identical to another document for any reason, including but not limited to marginal notations or deletions, is a separate document.

3. “Each” includes the term “every” and “every” includes the term “each.” “Any” includes the term “all” and “all” includes the term “any.” “And” includes the term “or” and “or” includes the term “and.”

4. “Identify” means to state as follows:

(a) With respect to a document and to the extent that the following information is not readily apparent from the document itself: (i) the document's title, date, author(s), signer(s), sender(s), addressee(s) and recipient(s); (ii) the type of document (e.g. letter, memorandum, agreement, invoice) its location and custodian; and (iii) a detailed description of its contents or principal terms and provisions.

(b) With respect to a communication and to the extent the following information is not readily apparent: (i) the time, date and place of the

communication; (ii) all maker(s) and recipient(s) of the communication; (iii) the mode of communication; (iv) the subject matter of the communication; and (v) any document generated in connection with the communication.

(c) With respect to a person and to the extent the following information is not readily apparent: (i) the person's full name; (ii) the person's employer, job title, and a description of the person's current duties and those duties at the time of deletion or destruction; and (iii) the person's business address.

5. "You" and "your" refers to you personally/professionally as a witness, your employer, or the party on whose behalf you testify, as indicated by the context of the question.

6. The terms "related to," "relating to" or "in relation to" mean being in any way relevant to, commenting on, consisting of, referring to, composing, comprising, discussing, evidencing, identifying, involving, reflecting, or underlying.

7. The terms "state," "describe" and "explain" call for answers independent from any documents that are required in response to these interrogatories. Such answers should be in a form (e.g., narrative, tabular) appropriate for a complete response to the interrogatory.

8. "USPS" or "Postal Service" refers to the United States Postal Service, including USPS Headquarters and any subordinate department, division, or office of the USPS, whether at the national, area, district or local

level. This definition includes the officers, directors, agents and employees of the United States Postal Service and its Board of Governors.

9. “Your testimony” refers to the written testimony submitted bearing your name in the instant proceeding, and may also embrace all responses in the way of documents, requests for admission or prosaic responses to questions formally docketed in this proceeding, depending upon the context of the question.

## INTERROGATORIES

**USPS/APWU-RT2-6.** Please confirm that on page 5, lines 4-5, of your testimony you make a statement about what you observe is missing from the Postal Service case.

- a. Please identify each document filed in this case that you reviewed to support this claim (by at least filing date, title and filing party).
- b. If you reviewed materials extrinsic to this case upon which you also rely to support your claim, please identify and describe these, as well.

**USPS/APWU-RT2-7.** Please confirm that on page 5, lines 2-3, of your testimony, you indicate an opinion that the proposed service standards changes have “the very strong possibility of affecting other postal products.”

- a. Please identify each product you have in mind.
- b. Is it your understanding that the Postal Service expects no impacts upon products? Please explain any affirmative, negative or equivocal response.
- c. Use of the word “other” implies an intended comparison to some product, or that some product is somehow distinct from “other ... products.” Please explain this statement and any intended comparison.
- d. Please explain in general terms what you understand comprises a single postal product.
- e. On what do you rely as the foundation for this statement?

**USPS/APWU-RT-8.** On pages 4-5 you assert, “Furthermore, the overwhelming focus on reducing cost has not been balanced with an appropriate evaluation of strategic opportunities to develop new revenue streams.” Since the Postal Service is welcoming of new revenue streams, please identify each strategic new revenue stream the Postal Service should, in your opinion, be focusing upon.

- a. For each such potential revenue stream, please explain your understanding—and foundation for your understanding—of the opportunity each presents citing, if possible, to publicly available documents illustrating the propriety of what you see as the missing Postal Service focus of its strategic resources upon these revenue opportunities.



b. For each such potential revenue stream, is it your understanding that other entities or firms are now focusing upon these opportunities? Please explain your response fully.

c. Do you have any understanding of whether, in addition to entities or firms identified in response to part (b), each revenue opportunity was previously explored or evaluated by commercial interests, although their interest is not ongoing? Please explain your response fully.

**USPS/APWU-RT2-9.** On page 5, you assert that “Relaxing the service standards **may** cause a significantly increased runoff of existing volume and revenue and it **may** preclude excellent opportunities to grow in the very attractive Business to Consumer parcel market.” [Emphases added here.]

a. Would you agree your assertion leaves room for a counter-assertion that relaxing the service standards may not cause a significantly increased runoff of existing volume and revenue and it may not preclude excellent opportunities to grow in the very attractive Business to Consumer parcel market.

b. Please explain any negative or equivocal response to part (a).

c. Does the quoted statement from your testimony rely upon any empirical data?

d. Your testimony evinces familiarity with witness Whiteman’s testimony (see, e.g., APWU-RT-2 at 21, 41); what is your understanding of whether the Postal Service views the volume, revenue and contribution losses estimated by its market research from network rationalization (see, e.g., USPS-T-12 at 22) are or are not “significant”?

**USPS/APWU-RT2-10.** On page 6, you assert that “most say that they will actively consider alternative means of delivery for parcel.”

**USPS/APWU-RT2-11.** Please confirm that in the last full paragraph on page 6 of your testimony you state that “most [customers] say that they will actively consider alternative means of delivery for parcels.”

a. Is it your understanding that parcels mailers today actively consider alternative means of delivery for their parcels?

b. Is it your understanding that tomorrow, or next year, or after network rationalization, that parcels mailers will cease considering their alternatives for delivering parcels?

**USPS/APWU-RT2-12.** Appendix 3 of your testimony addresses a Priority Mail Model, which your testimony addresses on pages 18-19. Please provide a complete copy of the model together with full documentation of it in accordance with Commission Rule 31(k), thereby allowing replication of its estimation from input data through all processing steps explained to its results.

a. Please identify each assumption on which this model relies and explain the reasoning that led to adoption of each.

b. What is your understanding of impacts upon delivery of Priority Mail that the Postal Service expects from Mail Processing Network Rationalization? Upon which materials filed in this docket is that understanding based?